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MEMO ENDORSED

January 5, 2024

BY ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Extension of time is granted.
Conference adjourned to 2/21/2024
at 10:30 a.m.

Re: Dylan Miles vs. City of New York, et al., 23 CV 7538 (CM)

Your Honor:

Colleen McMahon
1/10/2024

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and a supervising attorney in the Special Federal Litigation Division. In that capacity, I write to respectfully request: (1) a thirty-day enlargement of time, from January 5, 2024 to February 5, 2024, for defendant City of New York and the New York City Health and Hospital Corporation to respond to the complaint; and (2) a corresponding thirty-day adjournment of the initial conference currently scheduled for 10:00 a.m. on January 11, 2024, to a date and time convenient for the Court after February 11, 2024. This is the second request for an extension of time to respond to the complaint and an adjournment of the initial conference. Plaintiff's counsel, Peter Sverd, consents to the request for an adjournment of the conference; with respect to defendants request for an extension of time to respond to the complaint, Mr. Sverd consents only until January 19, 2023.

As an initial matter, the undersigned sincerely apologizes for the extremely late hour of the request for the extension of time to respond to the complaint. The reason for this request is the defense of this case is currently in the process of being transferred as Assistant Corporation Counsel, Gregory Musso, is no longer assigned to the case and is leaving employment at the Office of the Corporation Counsel on Monday, January 8, 2024. Given the circumstances, additional time is needed to transfer this case to a new attorney, acquire further information to sufficiently respond to the complaint, and for the newly assigned Assistant Corporation Counsel to thereafter familiarize themselves so that they can be sufficiently prepared for the initial conference.

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Accordingly, defendants respectfully request write to respectfully request: (1) a thirty-day enlargement of time, from January 5, 2024 to February 5, 2024, for defendant City of New York and the New York City Health and Hospital Corporation to respond to the complaint; and (2) a corresponding thirty-day adjournment of the initial conference currently scheduled for 10:00 a.m. on January 11, 2024, to a date and time convenient for the Court after February 11, 2024. As noted above, Plaintiff's counsel Peter Sverd consents to an enlargement of time to respond to the complaint until January 19, 2024 and consents to the request for an adjournment of the initial conference. I thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Alexandra Corsi

Alexandra Corsi
Senior Counsel
Special Federal Litigation Division
New York City Law Department

cc: By ECF
All attorneys of record